

REMARKS

Claims 1, 7, 13, 15 and 22 have been amended to more particularly point out and distinctly claim the subject matter of the present invention. No new matter has been added.

Claims 1-23 remain pending in the present application. In view of the above amendments and the following remarks, it is respectfully submitted that all of the presently pending claims are allowable.

The Examiner rejected each of the pending claims under 35 U.S.C. 102(b) as being anticipated by U.S. Patent No. 5,996,010 to Leong et al. ("the Leong reference"). *Office Action*, ¶ 3, pages 2-9. The Leong reference discloses a method of performing network management using a web capable agent. *Leong reference*, Abstract. A request manager receives an incoming network management request and parses the information contained in the request. *Id.* at col. 11, lines 3-18. The request manager then correlates the information in the request using a URL Dictionary. *Id.* at col. 11, lines 19-31. Using the correlated information, the request manager retrieves the requested information and instructs a response manager to send a response to the request. *Id.* at col. 11, lines 32-50.

In contrast, claim 1 of the present invention recites "a dynamic receiving module receiving and storing in a dynamic correlation table, without recompiling the software package, a correlation between a common name for the variable and the assigned name." This recitation of claim 1 indicates that the dynamic correlation table of the present invention may be populated with correlations during runtime, *i.e.*, without recompiling. The specification of the present invention includes a complete description of how one would accomplish such dynamic population of the correlation table. *See, Specification*, ¶¶ [0021] - [0023].

The request manager of the Leong reference does not perform the function of populating the URL dictionary. The Leong reference discloses that the request manager uses the URL dictionary to find correlations, but there is no description that the request manager populates the URL dictionary. In fact, there is no description of any module in the Leong reference that populates the URL dictionary. Furthermore, there is no description as to how one would populate correlations into the URL dictionary of the Leong reference. Thus, the Leong reference surely does not teach or suggest how one would *dynamically* populate a correlation table as is recited in claim 1 and described in the present invention.

In the rejection of claim 7, the Examiner points to a disclosure in the Leong reference which describes a client (*i.e.*, a web browser) receiving the entire URL dictionary from an agent (*i.e.*, a web server). *See, Office Action*, page 4 and *Leong reference*, col. 11, lines 34-40. However, once again, this does not disclose how the URL dictionary may be dynamically populated, but merely describes a fully intact URL dictionary being sent from an agent to a client. Claim 1 also recites “a request, including the common name of the variable being fulfilled by the software package by consulting the stored correlation in the dynamic correlation table.” Thus, the software package of the present invention is used to fulfill requests. In contrast, the client of the Leong reference does not fulfill requests, but rather is the entity that is making the request to the agent. Therefore, the mere transfer of the URL dictionary to the client does not disclose the dynamic population of a correlation table which is recited in claim 1 of the present invention.

Accordingly, the applicant respectfully submits that the Leong reference neither teaches nor suggests “a dynamic receiving module receiving and storing in a dynamic correlation table, without recompiling the software package, a correlation between a common name for the

variable and the assigned name" as recited in claim 1. Thus, the applicant respectfully requests the Examiner to withdraw the rejection of claim 1 and all claims depending therefrom (claims 2-6) under the Leong reference.

Claim 7 recites "receiving, by a device, a correlation between a common name and an assigned name for a variable, the variable describing a state of the device" and "storing the correlation in a dynamic correlation table of the device, the storing of the correlation being accomplished without compiling the dynamic correlation table on the device." The recitations of claim 7 make it clear that the dynamic correlation table is being populated during runtime. Thus, for the same reasons as described above with reference to claim 1, claim 7 should also be allowable.

Furthermore, the recitations in claim 7 make it clear that the device receiving the correlation is the device to which the variable relates. The URL dictionary received by the client in the Leong reference does not contain information about the client, but rather about the device on which the agent resides. Thus, the Leong reference does not teach the limitations of claim 7. Accordingly, for this reason and the same reasons as described above with reference to claim 1, it is respectfully submitted that claim 7 and all claims depending therefrom (claims 8-12) are also allowable over the Leong reference.

Claim 13 recites "a reading module to read software code in a file, the software code including a correlation between a common name and an assigned name for a variable" and "a dynamic correlation module receiving the correlation from the reading module and storing, without recompiling the software package, the correlation in a dynamic correlation table, wherein the software package fulfills a request to access the variable by accessing the dynamic correlation

table.” Thus for the same reasons as described above with reference to claim 1, it is respectfully submitted that claim 13 and all claims depending therefrom (claims 14-21) are also allowable over the Leong reference.

Claim 22 recites “reading software code in a file, the software code including a correlation between a common name and an assigned name for a variable, the variable describing a state of a device” and “dynamically storing the correlation a dynamic correlation table of the device, without compiling the dynamic correlation table on the device.” Thus for the same reasons as described above with reference to claims 1 and 7, it is respectfully submitted that claim 22 and all claims depending therefrom (claim 23) are also allowable over the Leong reference.

CONCLUSION

In view of the amendments and remarks submitted above, the Applicant respectfully submits that the present case is in condition for allowance. All issues raised by the Examiner have been addressed, and a favorable action on the merits is thus earnestly requested.

Respectfully submitted,

Dated: 8/2/04

By: 
Michael J. Marcin (Reg. No. 48,198)

FAY KAPLUN & MARCIN, LLP
150 Broadway, Suite 702
New York, NY 10038
(212) 619-6000 (phone)
(212) 619-0276 (facsimile)